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7 *Attorneys for Defendants,*

8 **KRM, Inc, d.b.a Thomas Keller Restaurant Group and**

9 **KVP, LP d.b.a. Bouchon Restaurant**

10 **UNITED STATES DISTRICT COURT**

11 **DISTRICT OF NEVADA**

12 FERNANDO HARO III, an individual,

13 Plaintiff,

14 vs.

15 KRM, INC, d.b.a THOMAS KELLER

16 RESTAURANT GROUP, a Foreign Corporation;

17 and TK MANAGEMENT, LLC, a Foreign Limited

Liability Company; and TK LAS VEGAS, LLC

18 d.b.a “BOUCHON AT THE VENETIAN”, a

Foreign Limited Liability Company,

19 Defendants.

CASE NO.: 2:20-cv-02113-APG-DJA

**STIPULATION AND ORDER TO
EXTEND TIME TO FILE
RESPONSE TO
FIRST AMENDED COMPLAINT
(First Request)**

20 Pursuant to Local Rule 7-1, Defendants KRM, Inc, d.b.a Thomas Keller Restaurant
21 Group (“KRM”) and KVP, LP d.b.a. Bouchon Restaurant (erroneously named as TK Las Vegas,
22 LLC d.b.a “Bouchon at the Venetian”) (“KVP”) (collectively, “Defendants”), by and through
23 their attorneys, Robert S. Larsen, Esq. and Dione C. Wrenn, Esq. of the law firm of Gordon Rees
24 Scully Mansukhani LLP, and Plaintiff Fernando Haro III, *in proper person*, hereby stipulate and
25 agree as follows:

26 1. Plaintiff filed his Complaint on November 16, 2020 [ECF No. 1].

27 2. Plaintiff filed his First Amended Complaint on February 22, 2021 (“FAC”) [ECF No.
28 9].

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1 3. On April 19, 2021, Plaintiff filed an Application for Entry of Clerk's Default against
2 Defendant TK Las Vegas, LLC d.b.a. Bouchon at the Venetian ("Application") [ECF No. 14].

3 4. On May 3, 2021, KVP filed its Objection to Plaintiff's Application ("Objection")
4 [ECF No. 15].

5 5. In its Objection, KVP argued that Plaintiff's service on TK Las Vegas, LLC was not
6 in accordance with the Federal Rules of Civil Procedure, and Plaintiff's improper service was for
7 an entity that Plaintiff knew was not the "entity through which [TKRG] operates 'Bouchon at the
8 Venetian' [...]." *See* ECF No. 15.

9 6. On May 12, 2021, the Court issued its Order Denying Application for Entry of
10 Clerk's Default ("Order") [ECF No. 17].

11 7. Pursuant to the Court's Order, the Court set the deadline for Defendants to file their
12 responses to the Plaintiff's Complaint as June 21, 2021. *See* ECF No. 17.

13 8. The Court further ordered the Parties to meet and confer regarding whether a
14 stipulation to amend the First Amended Complaint would be necessary to identify the correct
15 entities. *Id.*

16 9. The Parties conferred via electronic mail regarding amendment of the operative
17 complaint per the Court's directive.

18 10. The Parties shall submit a stipulation and proposed order to amend Plaintiff's First
19 Amended Complaint solely to properly identify the named defendant-entities on or before June
20 24, 2021.

21 11. Defendants request additional time to file their response(s) to the operative complaint
22 up to and including July 2, 2021.

23 12. This extension is sought to allow sufficient time for the Parties to file and receive an
24 order from the Court on the forthcoming stipulation to amend the First Amended Complaint, and
25 for Plaintiff to subsequently file the related Second Amended Complaint.

26 13. Plaintiff does not oppose Defendants' requested extension(s).

27 14. Accordingly, Defendants will file their response(s) to Plaintiff's SAC no later than
28 July 2, 2021.

15. This stipulation is not made for purposes of delay.

IT IS SO STIPULATED.

DATED this 21st day of June 2021.

DATED this 21st day of June 2021.

**GORDON REES SCULLY
MANSUKHANI**

FERNANDO HARO III

/s/ Dione C. Wrenn

/s/ Fernando Haro

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Plaintiff In Proper Person

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Las Vegas, Nevada 89101

Attorneys for Defendants,

KRM, Inc, d.b.a Thomas Keller Restaurant

Group and KVP, LP d.b.a. Bouchon

Restaurant

IT IS SO ORDERED.

UNITED STATES MAGISTRATE JUDGE

DATED: June 22, 2021